

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA**

**Plaintiffs,**

**v.**

**COMMONWEALTH OF PUERTO RICO,  
et. al.**

**Defendants.**

**CIVIL NO. 12-2039 (GAG)**

**MOTION IN COMPLIANCE WITH COURT ORDER**

**TO THE HONORABLE COURT:**

**COME NOW** the COMMONWEALTH OF PUERTO RICO and the PUERTO RICO POLICE DEPARTMENT, through the undersigned counsel, and respectfully allege and pray as follows:

1. On August 1, 2016, this Honorable Court issued a Transition Order to mitigate and prevent any undue interruption in operations or abrupt turnover in personnel that is likely to set back the Commonwealth's efforts to implement key civil rights reforms at PRPD. (See Docket No. 388).

2. Specifically, this Honorable Court ordered that the Commonwealth shall promptly notify the Court, the TCA, and the United States whenever there is a vacancy, for any reason, in positions or professional service contracts designated as critical in the Reform Unit or SAEA, pursuant to Paragraph 233 of the Agreement. (See Docket No. 388, p.5)

3. Pursuant to Paragraph 233 of the Agreement the PRPD has made its best efforts to retain personnel in the Reform Unit to ensure continuity by securing resources. However, in compliance with the aforementioned court order, the Commonwealth informs that two vacancies have occurred in the Reform Unit. Agent David Ruiz Rodriguez and attorney Rebeca I. Maldonado Morales have both sought new employments outside the PRPD.

4. Currently, the PRPD is identifying new recruitment to fill the vacant positions in order to ensure continuity of effort and a successful implementation.

**WHEREFORE**, it is respectfully requested from this Honorable Court to take notice of the above stated.

**I HEREBY CERTIFY** that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this January 20<sup>th</sup>, 2017.

**WANDA VÁZQUEZ GARCED**  
Secretary of Justice (Designated)

**WANDYMAR BURGOS VARGAS**  
Acting Deputy Secretary in Charge of  
Litigation and  
Acting Director of Federal Litigation  
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